

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)(KMW)

**CERTIFICATION OF JOHN R. DAVIS IN SUPPORT OF *DAUBERT*
MOTION TO EXCLUDE TESTIMONY OF
PUNAM KELLER, PH.D.**

I John R. Davis, certify as follows:

1. My name is John R. Davis. I am an attorney at law in Austin, Texas, and a partner with the law firm of Slack Davis Sanger, LLP, and serve as Court-appointed Plaintiffs' Executive Committee ("PEC") counsel. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' Motion to Exclude Testimony of Defendants' Marketing Expert Punam Keller, Ph.D.
2. Attached hereto as **Exhibit 1** to the Motion is a true and correct copy of Dr. Keller's January 12, 2022 Expert Report, as marked and used at Dr. Keller's deposition.
3. Attached hereto as **Exhibit 2** to the Motion is a true and correct copy of certain excerpts from the transcript of Dr. Keller's March 10, 2022 deposition.
4. Attached hereto as **Exhibit 3** is a true and correct copy of *People of the State of California v. Johnson & Johnson et al.*, No. 37-2016-17229-CU-MC-CTL, 2020 WL 603964 (Cal. Sup. Ct. – San Diego Jan. 30, 2020).

5. Attached hereto as **Exhibit 4** to the Motion is a true and correct copy of certain excerpts from the September 20, 2021 deposition transcript of Walgreen's 30(b)(6) corporate designee Catherine Stimmel.
6. Attached hereto as **Exhibit 5** to the Motion is a true and correct copy of certain excerpts from the October 1, 2021 deposition transcript of CVS's 30(b)(6) corporate designee John W. Holderman.
7. Attached hereto as **Exhibit 6** to the Motion is a true and correct copy of certain excerpts from the September 23, 2021 deposition transcript of Rite Aid's 30(b)(6) corporate designee Owen McMahon.
8. Attached hereto as **Exhibit 7** to the Motion is a true and correct copy of *Mondis Tech. Ltd. v. LG Elecs., Inc.*, No. 15-4431, 2021 WL 4077563, at *3 (D.N.J. Sept. 8, 2021).
9. Attached hereto as **Exhibit 8** to the Motion is a true and correct copy of *SEC v. Ambassador Advisors, LLC*, -- F. Supp. 3d --, *5 (E.D. Pa. Dec. 21, 2021).
10. Attached hereto as **Exhibit 9** to the Motion are true and correct copies of certain excerpts from the depositions of Putative Consumer Economic Class Representatives Cisneros, Cooper, Duffy, Erwin, Kaplan, Roberts, and Semmel.
11. Attached hereto as **Exhibit 10** to the Motion are true and correct copies of certain excerpts from the March 10, 2021 deposition transcript of ZHP Defendants' 30(b)(6) corporate designee Hai Wang.
12. Attached hereto as **Exhibit 11** to the Motion is a true and correct copy of Exhibit 8 as marked and used at the March 10, 2022 deposition of Dr. Punam Keller.

Executed this 3rd day of May, 2022.

/s/ John R. Davis
SLACK DAVIS SANGER, LLP
6001 Bold Ruler Way, Suite 100
Austin, TX 78746
Tel.: 512-795-8686
Fax: 512-795-8787
jdavis@slackdavis.com